

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ANTHONY MONEYHAM

CIVIL CASE NO: 3:18cv625
(to be supplied by Clerk
of the District Court)

(Enter above the full name of
plaintiff in this action)

v.

UNITED STATES

LIEUTENANT LEONOWITCZ

JOHN DOE, USE OF FORCE TEAM MEMBER

(Enter above the full name of
the defendant(s) in this action)

FILED
SCRANTON

MAR 19 2018

Per [Signature]
DEPUTY CLERK

COMPLAINT

1. The plaintiff ANTHONY MONEYHAM a citizen of
the County of UNION State of

Pennsylvania, residing at UNITED STATES PENITENTIARY LEWISBURG

wishes to file a complaint under 28 U.S.C 1346(b) AND
(give Title No. etc.)

28 U.S.C 1331(a)

2. The defendant is THE UNITED STATES, LT. LEONOWITCZ, AND JOHN

DOE, USE OF FORCE TEAM MEMBER. AN ADMINISTRATIVE CLAIM WAS PRESENTED TO
THE AGENCY AND DENIED.

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper
exhibits that give further information of your case, attach them to this completed form. Use as
much space as you need. Attach extra sheet(s) if necessary) ON April 1 - 2017 OFFICER

3. (CONTINUED) STROUD CAME TO THE DOOR AND ORDERED ME TO GIVE HIMMY

MATTRESS I ASK HIM WHATS GOING ON WITH MY SHOWER HE TURN AND ASK OFFICER STEELEY WHO
HAPPENING WITH MY SHOWER OFFICER STEELEY STATED THAT I WAS NOT GETTING A SHOWER SO I
ASK TO SPEAK TO A LIEUTENANT OFFICER STROUD TOLD ME TO CUFF UP I SAID NO ILL WAIT
UNTIL THE LIEUTENANT CAME OFFICER STROUD STATED "IT SOUNDS LIKE A THREAT TO ME" AND
WALK OFF, LIEUTENANT LEONOWICZ AND RETING LIEUTENANT M. STEAD CAME I EXPLAIN
WHAT HAPPENED AND ASK CAN I GET MY SHOWER LT. LEONOWICZ STATED "NO" AND WALK
OFF. LATER THE USE OF FORCE TEAM WAS AT THE CELL DOOR LT. LEONOWICZ ASK WAS I
GOING TO COMPLY TO HIS ORDER AND SUBMIT TO HAND RESTRAINTS I STATED YES I WAS
PLACE IN RESTRAINTS REMOVE FROM THE CELL BY THE USE OF FORCE TEAM ESCORTED TO THE FRONT OF THE
RANGE WHERE THE RESTRAINTS WAS PLACE EXCESSIVELY TIGHT I INFORM LT. LEONOWICZ THAT

4. WHEREFORE, plaintiff prays that THE COURT GRANT THE FOLLOWING RELIEF

A. ISSUE A DECLARATORY JUDGMENT STATING THAT: THE PHYSICAL
ABUSE OF PLAINTIFF BY DEFENDANT JOHN DOE IN USING UNNECESSARY FORCE AND
DEFENDANT LEONOWICZ FAILURE TO TAKE ACTION TO STOP DEFENDANT JOHN DOE FROM
ASSAULTING PLAINTIFF VIOLATED PLAINTIFF RIGHTS UNDER THE EIGHT AMENDMENT
TO THE UNITED STATES CONSTITUTION AND CONSTITUTED AN ASSAULT AND BATTERY UNDER

PENNSYLVANIA LAW. B. AWARDED COMPENSATORY DAMAGES AGAINST DEFENDANTS

UNITED STATES, JOHN DOE, AND LEONOWICZ, C. AWARDED PUNITIVE DAMAGES AGAINST DEFENDANTS
JOHN DOE AND LEONOWICZ D. GRANT SUCH OTHER RELIEF AS IT MAY APPEAR THAT PLAINTIFF IS ENTITLED.

Anthony Monaghan
 (Signature of Plaintiff)

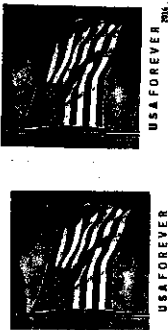
THE RESTRAINTS WAS PUNCHING MY SKIN. THE LIEUTENANT DID NOT ORDER THAT THE USE OF FORCE TEAM MEMBERS APPLY THE RESTRAINTS IN THE CORRECT MANNER. I WAS ESCORTED TO THE FIRST FLOOR ~~IN~~ THE TIGHT RESTRAINTS AND PLACED ON THE BUNK IN CELL #126 OF G-BLOCK AS THE USE OF FORCE TEAM MEMBERS WERE ~~EXITING~~ THE ROOM THE LAST TEAM MEMBER STARTING TWISTING MY ANKLE INTO THE RESTRAINTS USING SOME TYPE OF TRAIN TECHNIQUE THAT ~~INFLICT~~ EXTREME PAIN I STARTED SCREAMING THEN LT. LEONOWICZ STARTED "MONEY/HAM" DON'T RESIST MY TEAM THEN THE USE OF FORCE TEAM MEMBER CAME AND BEGAN TWISTING MY ANKLE INTO THE RESTRAINTS AGAIN I SCREAM IN PAIN THE TEAM MEMBER THEN LEFT THE ROOM AND I WAS LEFT IN THE EXCESSIVELY TIGHT RESTRAINTS OVER 24 HOURS UNABLE TO USE THE BATHROOM, DRINK WATER, OR EAT MY MEALS AND OFFICER STROUD WROTE AN INCIDENT REPORT AGAINST ME ALLEGING THAT I THREATENED HIM."

Inmate Name: ANTHONY MONEYHAM
Register Number: 42280-424
United States Penitentiary Lewisburg
P.O. Box 1000
Lewisburg, PA 17837

B⁺

3-14-18

MAR 15 2018



RECEIVED
SCRANTON

MAR 19 2018

PEH

DEPUTY CLERK

LEGAL MAIL

1850131148 BOSS

OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA
WILLIAM J NEAL FEDERAL BLDG. & U.S. COURTHOUSE
235 NORTH WASHINGTON AVENUE
SCRANTON, PA 18501-1148